

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LIBERTY MUTUAL INSURANCE COMPANY,	)	CIVIL ACTION
	)	NO. 96-10804-DPW
	)	NO. 1:04-CV-10674-DPW
Plaintiff,	)	(Old Southington Landfill)
	)	NO. 1:04-CV-10680-DPW
v.	)	(Solvents Recovery Service)
	)	
THE BLACK & DECKER CORPORATION,	)	
BLACK & DECKER, INC., BLACK & DECKER	)	
(U.S.) INC., EMHART CORPORATION, and	)	
EMHART INDUSTRIES, INC.,	)	
	)	
Defendants.	)	

**ASSENTED TO MOTION FOR LEAVE TO FILE UNDER SEAL  
BLACK & DECKER'S OPPOSITION TO LIBERTY MUTUAL INSURANCE  
COMPANY'S SUPPLEMENTAL MOTIONS FOR SUMMARY JUDGMENT  
WITH RESPECT TO THE SOLVENTS RECOVERY SERVICE SITE AND  
THE OLD SOUTHINGTON LANDFILL SITE**

Black & Decker, with the assent of Liberty Mutual, moves, pursuant to Local Rule 7.2, for leave to file under seal Black & Decker's Opposition to Liberty Mutual Insurance Company's Supplemental Motions for Summary Judgment with respect to the Solvents Recovery Service Site and the Old Southington Landfill Site. This document contains references to confidential documents produced by the parties pursuant to protective orders designed to ensure the confidentiality of said documents. Pursuant to Local Rule 7.2, Black & Decker requests that this Court enter an Order authorizing the sealing of this document.

Black & Decker also requests that the Court maintain this document under seal

until this action is closed and, thereafter, that said document be returned to counsel.

By their attorneys,

Dated: November 24, 2004

/s/ Jack R. Pirozzolo

Jack R. Pirozzolo BBO # 400400

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